

SERENA LARRICK
Estate of Megan Lerrick vs Tuscarawas County

August 24, 2022

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1 UNITED STATES DISTRICT COURT

2 FOR THE NORTHERN DISTRICT OF OHIO

3 EASTERN DIVISION

5 DEPOSITION OF SERENA LARRICK

8 ESTATE OF MEGAN LARRICK, ETC.)

)

)

Case No.

9 Plaintiffs)

)

10 5:21-CV-00959

11 VS.)

)

)

12 TUSCARAWAS COUNTY, ET AL.)

)

)

13 Defendants)

)

16 Deposition taken in the above-entitled cause, pursuant
17 to Agreement before Jodie L. Algarin, a Notary Public for
18 the State of Ohio, on August 24, 2022 to be used pursuant
19 to the Rules of Civil Procedure or by agreement of counsel
20 in the aforesaid cause of action, pending in the United
21 States District Court for the Northern District of Ohio,
22 Eastern Division.

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1 APPEARANCES OF COUNSEL

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1 STIPULATIONS
2
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4 It is stipulated and agreed by and between counsel
5 for the parties hereto that the deposition may be taken at
6 this time, 10:46 a.m., August 24, 2022, at the Offices of
7 Tuscarawas Prosecutor's Office, 125 E. High Street, New
8 Philadelphia, Ohio.

9 It is further stipulated and agreed by and between
10 counsel that the deposition may be taken in shorthand by
11 Jodie L. Algarin, a Notary Public for the State of Ohio,
12 and may be by her transcribed with the use of
13 computer-assisted transcription; that the witness'
14 signature to the finished transcript of her deposition is
15 waived; and that the deposition may be used on behalf of
16 the parties in the aforesaid cause of action as fully and
17 to the same extent as if written in the presence of the
18 witness and subscribed by the witness in the presence of
19 the Notary Public.

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9 OBJECTIONS:

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15 EXHIBITS:

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WHEREUPON,

SERENA LARRICK,

Called as a witness, having been first duly sworn by the Notary Public to testify the truth, the whole truth and nothing but the truth, was examined and testified as follows:

CROSS EXAMINATION

BY MR. LANG:

Q. Would you state your name for the court reporter?

A. Serena M. Lerrick.

Q. And where are you living?

A. 1961 Possum Hollow Road, New Philadelphia,
Ohio.

Q. My name is William Lang. I represent Tuscarawas County and a few of the other people involved, and this is Tim Cleary sitting to my right. He represents four of the defendants you sued. I'm going to ask you a series of questions; answer out loud so she can take the answers down. Nods and shakes of the head aren't really translatable, and uh-huh and huh-uh come out the same, so yes and no would be good.

A. Okay.

Q. Do you understand?

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1 A. Yes.

2 Q. If you don't understand one of my questions,
3 let me know. Lawyers have a tendency to ask convoluted
4 questions and don't want to admit that they don't
5 understand the question themselves.

6 A. Right.

7 Q. So you just tell me if you don't understand,
8 and I'll rephrase it, okay?

9 A. Okay.

10 Q. All right. You're Megan Lerrick's mother,
11 right?

12 A. Yes.

13 Q. And Megan had a child; is that right?

14 A. Yes.

15 Q. Aniyah?

16 A. Aniyah.

17 Q. A-N-I --

18 A. Y-A-H.

19 Q. -- Y-A-H. Okay. And are you now the
20 caretaker of Aniyah?

21 A. Yes.

22 Q. Have you been granted custody by any court?

23 A. Yes.

24 Q. What court did that?

25 A. Tuscarawas Probate.

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1 Q. And have you availed yourself of any
2 services or benefits from Tuscarawas County Job & Family
3 Services?

4 A. Yes, I do receive some benefits for
5 Aniyah, yeah.

6 Q. And can you explain to me what those are?

7 A. It's called caregiver cash. It's \$300 a
8 month.

9 Q. Anything else?

10 A. Little bit of food, food stamps. I think
11 100 maybe, \$125 a month, and a medical card.

12 Q. Is Aniyah in any counseling of any kind?

13 A. I tried, but they said that she's still
14 too young.

15 Q. And who told you that?

16 MS. BONHAM: I'll lodge the same objection
17 to personal health information that we've discussed with
18 respect to your clients. You can answer, if you can,
19 the name of the provider, but don't disclose any private
20 health information or advice you were given.

21 A. Right. I see a counselor, so she
22 explained the age that children are assessed for that.

23 Q. And what counselor are you seeing?

24 A. Camille. I can't think of her last name.
25 I just remember Camille.

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1 Q. And who is Camino [sic]? What organization?

2 A. OhioGuidestone.

3 Q. Is there a county caseworker for Aniyah's
4 case?

5 A. I'm not sure. I don't think.

6 Q. Aniyah's medical coverage, is that through
7 Medicaid?

8 A. Yes.

9 Q. As a caregiver and custodian for Aniyah, are
10 you getting any housing assistance from Tuscarawas Job &
11 Family Services?

12 A. No.

13 Q. Are you enrolled in I think it's called
14 Healthy Start program?

15 A. Yeah. Is that like WIC?

16 Q. Okay. That was my next question.

17 A. Yeah.

18 Q. So you are enrolled in the WIC program?

19 A. Yes.

20 Q. And that's, again, through Tuscarawas
21 County?

22 A. The health department.

23 Q. And how old is Aniyah?

24 A. Four.

25 Q. Is she in Head Start?

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1 A. Yes.

2 Q. Do you have to pay anything for that?

3 A. No.

4 Q. Is that part of the benefits she receives
5 from --

6 A. No.

7 Q. -- the county?

8 A. That is -- well, for her age group, that's
9 what you do is send a child to school to get them a head
10 start.

11 Q. Okay. And when were you granted custody by
12 the Court?

13 A. After Megan passed, it took me a while to
14 file, because I was still in shock. It was -- it was in
15 2019. I think it was, like, August or September.

16 Q. The counseling you received, how often do
17 you go?

18 MS. BONHAM: Continuing objection.

19 Listen, I'm going to talk to you about asserting a
20 health care privilege. You can answer the name of the
21 provider. Don't say anything that a health care
22 provider said to you or talk about any conversation you
23 had with the health care provider.

24 THE WITNESS: Okay.

25 MS. BONHAM: Go ahead and answer this one.

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1 A. The first couple years it was once a week.

2 Now it is once every two weeks.

3 Q. Have you been prescribed any kind of
4 medication --

5 MS. BONHAM: Objection.

6 Q. -- arising from that therapy?

7 A. Yes.

8 Q. And what are you taking?

9 MS. BONHAM: Objection. I'm going to
10 instruct her not to answer that.

11 MR. CLEARY: Are you asking for damages
12 for her?

13 MR. LANG: If you're going to waive a
14 claim for damages for her individually -- I mean, that's
15 part of the case.

16 MS. BONHAM: Are you asking for all of her
17 prescription medications?

18 MR. LANG: I'm asking for medications
19 she's on. I'm going to inquire about her therapy. If
20 you're going to instruct her not to answer those
21 questions --

22 MS. BONHAM: Are you asking for all her
23 prescription medications or prescription medications
24 related to her counseling? That's what I want to know.

25 MR. LANG: Well, I don't know what's been

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1 prescribed by this Camino [sic] or OhioGuidestone. I'm
2 assuming Camino [sic] is not a psychiatrist. Yeah. I'm
3 asking for everything.

4 MS. BONHAM: Let's start with -- if you
5 want to ask about the counseling, let's start there.
6 I'll reserve the option to make objections.

7 MR. LANG: Okay.

8 Q. OhioGuidestone is the umbrella company kind
9 of?

10 A. They are my counseling company. They're
11 not my doctor for my medication.

12 Q. Okay.

13 A. I see an actual --

14 Q. So where's OhioGuidestone located?

15 A. In Tuscarawas -- I don't know. Kelly
16 Street maybe.

17 Q. In New Philadelphia?

18 A. Yes.

19 Q. And the individuals or therapists at
20 OhioGuidestone, what are they treating you for?
21 Depression?

22 A. Yeah.

23 Q. Has there been a diagnosis of post-traumatic
24 stress disorder?

25 A. I don't -- I'm not 100 percent sure. I

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1 mean, she doesn't go over that part with me there. I
2 just come in and do my session and then I leave.

3 Q. You mentioned you are on medication
4 incidental to this therapy; is that right?

5 A. I don't understand.

6 Q. Are you on any medication for depression?

7 A. Yeah.

8 Q. Okay. And you have a doctor that prescribed
9 that?

10 A. Yes.

11 Q. And what's the name of the doctor who
12 prescribed that?

13 A. Barbara St. Clair.

14 Q. Is she here in New Philadelphia?

15 A. No.

16 Q. Where is she located?

17 A. In Cambridge, Ohio.

18 Q. Has she been a long-time physician for you?

19 A. Yes.

20 Q. Has her care of you -- did her care of you
21 predate Megan's death? Was she your doctor before Megan
22 passed away?

23 A. Yes.

24 Q. So she's treating you for other things like
25 colds and whatever?

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1 A. She is -- no. Barbara St. Clair is a
2 mental health doctor.

3 Q. And do you have therapy sessions with
4 Barbara St. Clair also?

5 A. Yes.

6 Q. And how often do you see Barbara St. Clair
7 for therapy?

8 A. Every three months. Once every three
9 months.

10 Q. Have you adopted Aniyah?

11 A. No.

12 Q. You were just granted custody of her?

13 A. Yes.

14 Q. Does Aniyah have any kind of hearing
15 impairment that you're aware of?

16 A. No.

17 Q. How about speech or language difficulties?

18 A. No.

19 Q. Is she autistic?

20 A. Not that I know of, no.

21 Q. Do you know if she has any learning
22 disabilities?

23 A. No.

24 Q. Do you think that her development is
25 consistent with that of other four-year-olds?

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1 MS. BONHAM: Objection.
2 A. I do.
3 Q. She's able to walk okay?
4 A. Yes.
5 Q. And you haven't noticed any kind of -- have
6 you noticed any kind of emotional disturbances --
7 MS. BONHAM: Objection.
8 Q. -- in her?
9 A. No.
10 Q. Are you presently married?
11 A. No, sir.
12 Q. And Tim Lerrick is Megan's father?
13 A. Yes.
14 Q. Do you have any contact with him?
15 A. We do speak on the phone once in a while.
16 Q. Do you have his phone number on you?
17 A. I think I do -- it's his mother's phone
18 number. He doesn't have a phone.
19 Q. Now, who is Vanessa Ransom, R-A-N-S-O-M?
20 A. That is my other daughter.
21 Q. Is that Tim Lerrick's daughter?
22 A. No.
23 Q. Who Vanessa's father?
24 A. Vanessa's father -- is that relevant to
25 this case? Melton Parnell.

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1 Q. And Michael Ransom, is that --
2 A. Yeah.
3 Q. -- your son?
4 A. Yep.
5 Q. Does Vanessa Ransom live locally?
6 A. No. She lives in Cambridge.
7 Q. And what about Michael Ransom?
8 A. He lives in Cambridge as well.
9 Q. And Matthew Lerrick is another son you have?
10 A. Uh-huh, yes.
11 Q. And where does he live?
12 A. Byesville, Ohio.
13 Q. Pardon me?
14 A. Byesville, Ohio. It's right beside
15 Cambridge.
16 Q. How old is Matthew Lerrick?
17 A. I want to say 23.
18 Q. How about Michael Ransom?
19 A. Twenty-nine.
20 Q. If birthdays are better --
21 A. Yeah.
22 Q. -- why don't you give me birthdays?
23 A. 9/1/92 for Michael. Matthew is 2/25/99,
24 and Vanessa is 4/30/91.
25 Q. I knew that was easier.

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1 A. It is.
2 Q. How did Matthew and Megan get along?
3 A. Very well. I mean, typical brother and
4 sister, but they got along well.
5 Q. They hang out together?
6 A. Sometimes.
7 Q. When you say that, what do you mean?
8 A. Well, I mean sometimes. Sometimes he
9 wanted to hang with his friends, and sometimes he wanted
10 to hang with her.
11 Q. How about Michael Ransom? What kind of
12 relationship did he have with Megan, if you're aware of
13 that?
14 A. They had a good relationship. Yeah. They
15 had a good relationship.
16 Q. They do things together?
17 A. No. He was a little bit older than her.
18 Q. How about Vanessa, who was even older? What
19 kind of relationship --
20 A. They had a good relationship. They were
21 sisters. They did a lot together.
22 Q. Like what?
23 A. Hung out together, went shopping together,
24 went to NA meetings together. Stuff like that.
25 Q. When did you first become aware that Megan

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1 was taking illegal drugs?

2 A. When she turned 18, she kind of hurried to
3 move out, and she wanted to go to her dad's. I kind of
4 thought that was weird, you know, she was in a hurry;
5 because a month before that we had a talk about, you
6 know, her getting nervous about turning 18, so --

7 Q. Was she working at that time?

8 A. Summer, yeah.

9 Q. Was she going to school?

10 A. Yep.

11 Q. She was in high school?

12 A. Megan was in an alternative high school.

13 Q. Explain that to me. What is that?

14 A. It's just for like -- I don't know. Like
15 kids that can't get along with other kids sometimes.

16 Q. And did Megan have a difficult time getting
17 along with other kids back then?

18 A. It was girls, yes, girl.

19 Q. Did she get in fights, or what was the
20 problem?

21 A. Well, they always -- they were arguing
22 over girls. Girls arguing over girls. It was simple,
23 to me, but that's just the way girls were. Because when
24 I was in school, we never done that.

25 Q. So she had problems in school, regular

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1 school?

2 A. No. She was an honor roll kid.

3 Q. Okay. So how did she end up in an
4 alternative school?

5 A. It was girls. She was always arguing with
6 girls. They were fighting over other girls, gay, you
7 know? That.

8 Q. I understand that.

9 A. Okay.

10 Q. But did she get kicked out of school?

11 A. No. They just come up with this
12 alternative school, and I thought it would be better for
13 her to get away from those girls, so we put -- I put her
14 in that school.

15 Q. Okay. And where is this school located?

16 A. It is FoxFire Academy in Cambridge, but I
17 don't think it any longer exists.

18 Q. And how long was she there?

19 A. Two years, maybe three.

20 Q. Did she graduate from high school?

21 A. She was four credits away.

22 Q. So the answer would be no?

23 A. Right.

24 Q. So you thought it was strange that she
25 wanted to go live with her dad?

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1 A. Yeah.

2 Q. Why did you think it was strange?

3 A. Well, because she was nervous about
4 becoming an adult, and then she just wants to, you
5 know -- she actually kind of tried to move out when I
6 wasn't home, and I think that that was when she was
7 hiding, you know, the fact that she was using -- she
8 knew I would be able to tell.

9 Q. FoxFire Academy, was this a residential
10 school?

11 A. What do you mean?

12 Q. Did she live there?

13 A. No, no.

14 Q. So she lived at home and went to school --

15 A. Yeah.

16 Q. So it was after she moved out that you
17 realized that she was taking drugs?

18 A. Yes.

19 Q. People always ask me, what's your son's drug
20 of choice, and I tell them anything that's around. Is
21 that how Megan was?

22 A. Well, it kind of got to be that way, but
23 her drug of choice was meth, but not anything around,
24 just, you know, maybe some pot, some alcohol, couple
25 cigarettes and she was good to go, I guess. I mean, I

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1 know she was terrified of heroin. And then this new
2 crazy thing come out that was killing people, she was
3 petrified of that.

4 Q. Fentanyl?

5 A. Yeah.

6 Q. She do coke?

7 A. Not to my knowledge, but, you know, I
8 don't know. I just know the meth.

9 Q. I know. We're the last people to know.

10 A. (Nodding head.)

11 Q. I get it. But there came a time prior to
12 Megan's death where you were concerned about Aniyah; is
13 that right?

14 A. Yeah.

15 Q. Tell me about that. Why were you concerned
16 about Aniyah, Aniyah's health and safety?

17 MS. BONHAM: Objection.

18 A. I wasn't -- I wasn't concerned about her
19 health. Maybe her safety, yes, because Megan was going
20 to Cambridge to her dad's house. Her dad's house was a
21 flop house. Anybody and everybody was there, and I did
22 not want that baby there.

23 Q. Had you had some discussions with friends
24 about getting custody of Aniyah at that point in time?

25 MS. BONHAM: Objection.

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1 A. One. One friend.
2 Q. And who was that?
3 A. A lady that I went to church with.
4 Q. Do you recall her name?
5 A. Janeen Stillion (phonetic spelling).
6 Q. Do you know who the father of Aniyah is?
7 A. I do.
8 Q. Who's the father?
9 A. Chandler Abrams.
10 Q. Do you know where he is?
11 A. In a -- locked up.
12 Q. Where at?
13 A. I think it's a rehab of some sort, EOCC.
14 Q. E?
15 A. OCC.
16 Q. OCC.
17 A. Yeah. I think it stands for Eastern Ohio
18 Correctional Center.
19 Q. Where's that located?
20 A. I don't know. I don't know.
21 Q. Has he had some relationship with Aniyah --
22 A. No.
23 Q. -- besides being the father?
24 A. No.
25 Q. Since you've gotten custody of Aniyah,

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1 Chandler hasn't come to visit, has he?

2 A. No.

3 Q. How did you find out that Megan passed away?

4 A. Three sheriffs came to my house.

5 Q. And do you recall what they told you or one
6 of them told you?

7 A. Ken told me that Megan had passed, and I
8 said what? And he said, I'm sorry, but your daughter
9 has passed away.

10 Q. Did you indicate to him or did he indicate
11 to you why she had died?

12 A. No. I asked him why she died.

13 Q. And what did he tell you?

14 A. He didn't know.

15 Q. Did you have any suggestions for him --

16 A. No.

17 Q. -- about why?

18 A. No. No suggestions at all. When he told
19 me that she passed away, it was instant shock.

20 Q. Do you recall anything else he told you on
21 that visit?

22 A. I asked him if he tried to resuscitate
23 her, and he said yes; and I asked him if he was sure it
24 was her, and he said yes.

25 Q. Were you aware that Megan was in the

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1 Tuscarawas --

2 A. Yes.

3 Q. -- County Jail?

4 A. Yes. Well, at first I wasn't, and then I
5 was.

6 Q. When did you become aware of that?

7 A. That morning when I called to check and
8 see if she was there.

9 Q. So you called the Tuscarawas County Jail --

10 A. Yes.

11 Q. -- to find out if she was there?

12 A. Yes.

13 Q. And who did you speak to there?

14 A. A female.

15 Q. And were you told that she was --

16 A. Asleep.

17 Q. -- an inmate there?

18 A. Yep.

19 Q. What other information did you give them?

20 A. That was it. She told me that she was
21 there and that she was asleep, and I said thank God. I
22 don't have to worry anymore, and then I hung up.

23 Q. Did Megan ever tell you that she swallowed
24 drugs in plastic bags --

25 MS. BONHAM: Objection.

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1 Q. -- to avoid detection?

2 MS. BONHAM: Objection.

3 A. I don't know what is a bubble. I don't
4 know what that is, but she said that she had to ingest a
5 bubble, whatever that is. I don't know what it is.

6 Q. So Megan told you that she had ingested
7 drugs --

8 A. She didn't say --

9 Q. -- at other times?

10 A. She didn't say drugs. She said a bubble.

11 Q. A bubble.

12 A. I don't know what it is.

13 Q. You didn't ask her what she meant by that?

14 A. No. I just got really mad and said I
15 don't know what it is, but you better not ever do it
16 again.

17 Q. And how many times did she do it, to your
18 knowledge?

19 A. I don't know. I'm not Megan, so to my
20 knowledge, it would have -- you know, whatever a bubble
21 is.

22 Q. Did you have a discussion with the sheriff,
23 Orvis Campbell, about Megan's death?

24 A. He did come by the next day. Yeah. I
25 don't -- he just said that he was stopping by because he

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1 had a daughter Megan's age, and he asked me if I
2 believed in God, and I pointed out my Bible and said
3 yes, I do, and then I don't know. I was a wreck.

4 Q. Did he tell you he didn't know why Megan
5 died?

6 A. Yeah.

7 Q. And did you indicate to him that she died of
8 a drug overdose?

9 MS. BONHAM: Objection.

10 Q. In your opinion?

11 A. Maybe. I can't -- you know, I was a mess
12 that day.

13 Q. Did you tell him that she probably ingested
14 or swallowed a bubble?

15 MS. BONHAM: Objection.

16 A. Maybe. I don't -- I was a mess. I was
17 crying when he was there. That was fresh. I mean --

18 Q. Did you tell the sheriff that Megan had
19 swallowed drugs at other times --

20 MS. BONHAM: Objection.

21 Q. -- in a bubble?

22 A. Our conversation wasn't long. He was
23 there for maybe five minutes. We talked mostly about
24 this being plastered all over the news. I remember me
25 being upset about that and then him saying he had a kid

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1 her age, and I remember kind of breaking down. And I
2 remember him getting up and walking out the door.

3 Q. When did you find out that Megan had been
4 arrested on May the 8th, 2019?

5 A. Right after she was arrested.

6 Q. That would have been that Cambridge Police
7 picked her up?

8 A. Uh-huh.

9 Q. How did you find that out?

10 A. My ex-husband's neighbor was sitting
11 outside while the cops were arresting Megan and this
12 other girl.

13 Q. Her name was Sheri?

14 A. Yep.

15 Q. Did you talk to her on the phone or was it
16 Facebook --

17 A. It was a Facebook text message. I don't
18 have her -- I used to have her phone number, but I don't
19 have it anymore, I don't think.

20 Q. So you were messaging by Facebook with
21 Sheri --

22 A. Yeah.

23 Q. -- about what happened?

24 A. Sheri messaged me and said Megan got
25 arrested, and I said are you sure? And she said yes.

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1 And then she told me that another girl got arrested and
2 they took dope off of the other girl.

3 Q. Did you make any phone calls as a result of
4 that Facebook messaging?

5 A. Well, I called the Guernsey County Jail to
6 see if my daughter was there.

7 Q. About what time did you call there?

8 A. I don't know. I can't really remember.
9 It was at night, and then they answered the phone and
10 said, no, she's not here. And then I remembered that
11 Megan may have a warrant here, so I figured that they
12 brought her here.

13 Q. Did you contact the New Philadelphia Police
14 Department?

15 A. No, not that I can remember.

16 Q. New Philadelphia has a jail -- the police
17 department has a jail, right? You're aware of that?

18 A. I'm not from here, no. I wasn't aware. I
19 am aware now, yes.

20 Q. So the warrant you thought she had was from
21 New Philadelphia?

22 A. Yes.

23 Q. Correct?

24 A. Yeah.

25 Q. And when you recalled that, did you call New

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1 Philadelphia Police Department to find out if --
2 A. Maybe.
3 Q. -- they had executed on the warrant?
4 A. Maybe. I just know that I had a strong
5 feeling about her. I called the Guernsey County Jail, I
6 called the Tuscarawas County Jail, and that's all I can
7 remember.
8 Q. Had Megan tried to call you that night?
9 A. Yes, on her cell phone before she was
10 arrested.
11 Q. How many times did she try to call you?
12 A. I had three or four missed calls from her.
13 Q. Did she try to text you on your phone?
14 A. She -- she did. She sent a message that
15 said, you would, meaning you would not answer the phone.
16 Q. Was that through Facebook?
17 A. Yeah. On Messenger.
18 Q. Did you try to call her back?
19 A. I never got her calls. For some weird
20 reason, my phone never rang. I didn't see her missed
21 calls until the next day.
22 (Whereupon Defendant's Exhibit B was marked.)
23 Q. I'm going to hand you what's been marked as
24 Defendant's Exhibit B.
25 A. Okay.

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1 Q. I gave a copy to your lawyer.
2 A. Yeah.
3 Q. It's six pages. Does yours have six pages?
4 A. Yeah.
5 Q. I'm going to hand you a pen. Could you put
6 the page numbers on the bottom there, one, two, three,
7 four, five, six, on each page?
8 A. Okay.
9 Q. One on the first page and two on the second
10 page, so on.
11 A. (Witness complying.)
12 Q. Okay. Thank you. So I better do that with
13 mine. Why don't you look at those six pages for me.
14 A. I look at those over all the time.
15 Q. Are these the messages from Facebook
16 Messenger with Sheri?
17 A. Yeah. These are that.
18 Q. And this is an accurate copy of the Facebook
19 Messenger from your account; is that right?
20 A. Yeah, that's it.
21 Q. On page 1 down towards the bottom Sheri
22 texts you, we watched her one day. Well, my daughter
23 Kendra did. Do you see that?
24 A. Yeah, I see it.
25 Q. And is that next blue area your reply, I'm

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1 kind of glad BC now I have grounds to keep her?

2 A. Yes. That's my reply.

3 Q. So was it your intention to become the
4 custodian of --

5 A. I would have if Megan --

6 Q. -- Aniyah -- you have to wait until I finish
7 the question.

8 A. Okay.

9 Q. Was it your intention to become the
10 custodian of Aniyah at around that time?

11 A. Yeah.

12 Q. So on page 3 at the bottom, you indicate
13 that you called the jail. That would have been the call
14 to the Guernsey County Jail?

15 A. Uh-huh.

16 MS. BONHAM: Yes?

17 A. Yes.

18 Q. And on page 4, the first -- your first
19 response, oh, well, I love having the baby here. I'm
20 keeping her. What did you mean when you said that to
21 Sheri?

22 A. Well, I meant exactly what I said. If
23 Megan was in jail, I'm keeping her. No one else -- I'm
24 not going to let anyone else get her. It's my
25 grandchild.

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1 Q. On page 5 Sheri indicates, towards the
2 middle of the page, Tim said they might be bringing her to
3 New Philly. Do you see that?

4 A. Yep. I see it.

5 Q. And is that when you got the idea that she
6 might be going to New Philadelphia?

7 A. I think so, but -- I think I remembered
8 before. I just didn't want to let her know everything
9 about what was going on with Megan.

10 Q. Do you know who the Tim is that she's
11 talking about?

12 A. Megan's dad.

13 Q. And in the next line, Jennifer going to
14 Carroll County is what Ray said. Do you know who Ray is?

15 A. I think that is the guy that was
16 interviewed. I don't know him. Don't know his last
17 name. I think he was the guy at Tim's house the day
18 that Megan got arrested.

19 Q. Do you think they were doing drugs together?

20 MS. BONHAM: Objection.

21 A. I don't know.

22 Q. There's a Ray in the -- one of the police
23 reports indicates that Megan did a line of coke there with
24 him.

25 A. Okay. I didn't see that. Then that's

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1 probably who this is.

2 Q. Did you tell anybody at the Tuscarawas
3 County Jail when you called that Megan had ingested drugs
4 before?

5 A. No.

6 Q. Did you indicate to them that she had
7 swallowed a bubble before?

8 A. No.

9 Q. And Sheri's last name is Conner; is that
10 right?

11 A. I think so, yes.

12 Q. C-O-N-N-O-R?

13 A. C-O-N-N-E-R.

14 Q. E-R.

15 MR. LANG: Sheri, S-H-E-R-I.

16 Q. Did you have any discussion with the
17 Tuscarawas County Coroner or anybody in his office about
18 Megan's death?

19 A. They called me.

20 Q. Do you recall what conversation you had
21 with -- Ms. Clark, I think, called you?

22 A. Yeah. Ms. Clark. I asked if I could
23 identify my daughter. I wasn't allowed. I don't know.
24 They asked me a lot of questions. I don't remember.

25 Q. When did that call come in to you?

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1 A. That night.

2 Q. On --

3 A. It was kind of late. I mean, I don't
4 know.

5 Q. I know it's difficult. Sorry to dredge this
6 up.

7 A. I don't --

8 Q. You can't recall anything about that
9 conversation?

10 A. Well, I asked to identify the body, and
11 they said no. And I said why not? And she said because
12 it's raining and you can't drive to Cleveland. We sent
13 her to Cleveland. She told me that I was right, and I
14 said, what do you mean, I'm right? They did an autopsy
15 on her here in Tuscarawas County and then they sent her
16 to Cleveland for another autopsy. Yeah.

17 Q. And why did she say --

18 A. She wanted me to identify, like, name
19 things. You told her Megan had a wart on her toe. She
20 said I was -- she said you're right. She said we found
21 a baggie. That's what she said. You're right. That's
22 what she said.

23 Q. And they found a baggie inside of her body?

24 MS. BONHAM: Objection.

25 Q. Did she explain that to you?

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1 A. You know, I try to block some of this out
2 because it's hard. Repeat the question, please.

3 Q. Did she indicate that they found a baggie
4 containing drugs inside Megan's body?

5 A. Yes.

6 Q. And did she indicate to you that that was
7 why Megan died?

8 A. She didn't say. She said that there had
9 to be a toxicology autopsy performed in Cleveland. She
10 did not say that was because Megan died.

11 Q. Did you tell anybody from the sheriff's
12 department when they came to notify you of Megan's death
13 that you had known in the past that Megan swallowed --

14 A. No.

15 Q. -- drugs when she came into contact with the
16 police?

17 MS. BONHAM: Objection. She's answered
18 that. Go ahead.

19 A. No.

20 Q. So are you saying that you did not say such
21 a thing or that you don't recall?

22 MS. BONHAM: Objection. She's answered
23 that.

24 A. I'm saying I did not say that when they
25 came to tell me that Megan passed.

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1 Q. Did you indicate to anybody that you were
2 sure she OD'd?

3 MS. BONHAM: Objection.

4 A. No.

5 Q. Did you indicate to anybody from the
6 sheriff's department that you picked up Aniyah the day
7 before and that you had her with you --

8 MS. BONHAM: Objection.

9 Q. -- on May 9th.

10 A. I did tell -- yeah.

11 Q. Did you tell them that Megan had taken
12 Aniyah to meth houses in Coshocton --

13 MS. BONHAM: Objection.

14 Q. -- during the week before her death?

15 A. No.

16 Q. Did you have to convince Megan to give you
17 Aniyah on May 8th?

18 A. On May 8th, no. She willingly give her to
19 me, but before -- May 6th, May 7th, I was trying to
20 convince her.

21 Q. How did you do that?

22 A. I just kept calling and saying, you know,
23 I'll take her now. What I really was trying to do was
24 get Megan to come home.

25 Q. Did you ask Megan to come home?

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1 A. Uh-huh.
2 Q. And what did she tell you?
3 A. She would come home when she was ready.
4 Q. Do you know if Tim Lerrick supplied Megan
5 with drugs, meth, heroin?
6 A. I don't think so. Money, yeah, but not
7 drugs.
8 Q. You characterized Tim's house as a flop
9 house --
10 A. Yeah.
11 Q. -- previously. What did you mean by that?
12 A. Anybody was allowed there. You know, like
13 all the town drunks would be there, some people that
14 used, I'm sure. It was just -- there was never a time
15 that the door would be -- okay. Nobody can knock or
16 come in, you know? There was never any of that. It was
17 always an open door.
18 Q. Had you been to Tim's house?
19 A. Yeah.
20 Q. Had you gone there on May the 8th to pick up
21 Aniyah?
22 A. Yes, I did, and as far as I got was the
23 porch. I never went inside. When I picked my kids up
24 from there, I was always in the car. I didn't associate
25 with any of that or any of those people.

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1 Q. How did you find out that Megan was using
2 meth?

3 A. After she moved out, she wouldn't let me
4 see her for a month, maybe a month and a half. She
5 would -- I would call her and say I'm coming to get you,
6 we're going to go get some pizza or go shopping or
7 something. No, mom, I don't want to go. I'm fine. And
8 I said, Megan, what's going on with you? I'm fine, mom.
9 I just want to stay here.

10 She act like -- Megan had a depressed, you know,
11 way about her, because she had one eye, and she was
12 always kind of depressed. So she was always quiet, but
13 I wanted to see her. And I had to basically tell her
14 that one day, and she said, you don't want to see me,
15 mom. And I said I do. And I said I have to -- you're
16 my child. I have to see you. I want to, you know, hug
17 you, and she wouldn't let me see her; and then she
18 called me and said to come and pick her up. And when I
19 seen her, I knew that it was something serious.

20 Q. Did you ask her whether she was taking meth
21 or using meth?

22 A. I did.

23 Q. And what was her response?

24 A. She told me yeah.

25 Q. Did she tell you she was using other drugs

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1 too?

2 A. No. When she first started the whole
3 thing it wasn't other stuff. It was just that. Tim was
4 married before and had two other kids, and the son moved
5 back from Florida, and he introduced Megan to the meth.

6 Q. When she -- did she ever move back home?

7 A. She did. She moved back home, I would
8 say, her first year after she got into the meth. She
9 came and she wanted to get away from it, and she moved
10 in with me.

11 Q. So that was when she was 19?

12 A. Yeah.

13 Q. Is that right?

14 A. Yeah. That sounds right.

15 Q. And did you help her try to kick that habit?

16 A. Yeah. The best I could. I didn't really
17 understand addiction. There's still some things I'm,
18 you know, trying to learn; but, yeah. I tried. I
19 tried, I begged, I pleaded, I, you know, asked her to go
20 to NA meetings. I even got on the phone and found a
21 rehab in Cincinnati, but --

22 Q. Did she go to NA meetings?

23 A. She did go to some. She went to some. I
24 begged her, you know, to talk to her doctor so he could
25 tell her what that does to you.

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1 Q. But she only went to a few NA meetings --

2 MS. BONHAM: Objection.

3 Q. -- that you're aware of?

4 MS. BONHAM: Objection.

5 A. Okay.

6 Q. Let me rephrase that. When she was living
7 with you, did she go to NA meetings?

8 A. She did.

9 Q. Over what period of time did she go to NA
10 meetings?

11 A. Well, it was whenever she was struggling
12 trying not to use, because Megan -- in her three short
13 years of using that stuff, Megan didn't use it every
14 day. She would go for a while and use, and then she
15 would fight it for a month or two. And when she was
16 fighting it would be when she would go to the NA
17 meetings.

18 Q. And when she was fighting it, was she living
19 with you --

20 A. Yeah.

21 Q. -- at --

22 A. Yeah, she was.

23 Q. -- those times? When she relapsed and
24 started using again, was she still living with you?

25 A. Yeah, she was.

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1 Q. Would she go out for a few days and be gone
2 using?

3 A. Well, Megan would -- it was Cambridge.
4 She just couldn't stay away from her dad's, you know? I
5 live here and I work here, but like on the weekends, I
6 have other kids that are there, so I would go and -- I
7 have grandkids -- other grandkids, and I go visit them,
8 and she'd want to go, you know? And here I am -- she
9 would call someone to pick her up, and then I'd have
10 to -- before I come back here I would have to pick her
11 up at her dad's. She always found her way there.

12 Q. And what would happen when you picked her up
13 from her dad's?

14 A. She'd just get in the car and we'd ride up
15 here, you know. I give her lectures, but that is
16 something -- you know, Megan didn't want lectured. She
17 didn't want to hear it, and it was just an argument with
18 a big headache, so, you know, she just seemed like
19 everything was okay if I picked her up, I guess. I
20 don't know.

21 Q. And after you got her home, did she -- was
22 she working? Did she go to work the next day or was she
23 just laying around?

24 MS. BONHAM: Objection. Go ahead.

25 A. She -- there was no laying around. Megan

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1 wasn't lazy. She was, you know -- Megan wasn't lazy.
2 That was my one and only child that did anything in the
3 world for me without me ever having to ask. Yeah. She
4 worked, but she had times, you know, where work was kind
5 of -- it was hard for her to get because she didn't have
6 transportation, and I would already be at work. She
7 didn't have a driver's license, but Megan made it work
8 because she would call the public trans bus to pick her
9 up and take her baby -- her and her -- take the baby to
10 daycare.

11 And then she'd complain because she'd say, mom,
12 it's so embarrassing. They leave me there and then I
13 got to stand there and wait for them to come back and
14 hope I get to work on time. She went through that for a
15 while trying to do what is right. She went to church.
16 She -- Megan was a good person. She just got caught up.

17 Q. And how long was she using, that you were
18 aware of?

19 A. The three years from the time she moved
20 out and got on that meth. That was it. That stuff
21 just --

22 Q. Do you know if she was selling stuff,
23 dealing stuff?

24 MS. BONHAM: Objection.

25 A. No. I think she was using it.

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1 Q. Did you have any contact with the young
2 woman who was picked up with her on May 8th?

3 A. No.

4 Q. When you talked to the sheriff after Megan
5 died, did you talk to him about Megan's drug use?

6 MS. BONHAM: Objection.

7 A. I can't remember. Maybe.

8 Q. When you picked up -- on May 8th when you
9 picked up Aniyah, you picked her up from Megan, right?

10 A. Well, yeah, and Megan had her, but Tim was
11 on the porch with Aniyah; and when I come up the steps
12 and went to the porch, I asked him where Megan was, and
13 he said she went inside. And I figured Megan would be
14 outside before I got in the car and left, so -- and she
15 was. But, yeah, I got Aniyah off the porch and put her
16 in the car, and Megan come out and she kissed her child
17 and told her she loved her, and she told me she loved me
18 and to drive safe and asked me if I would come back and
19 get her. And I told her, yeah, after I got the baby or
20 the other kid off the school bus.

21 Q. When was she expecting you to pick her up?

22 A. That day in the evening. She just didn't
23 know -- I didn't give her a certain time. She just
24 knew, you know, it would be in the evening, because I
25 said I had to get Zari off the bus, of course get the

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1 girls something to eat, and I wanted to relax a little
2 bit, you know? I had worked before I went down.

3 Q. So Megan was coherent then?

4 MS. BONHAM: Objection.

5 Q. You had a discussion with her about coming
6 back?

7 A. I did, yes. You could tell she was high.

8 Q. She wasn't drunk or anything, was she?

9 MS. BONHAM: Objection.

10 A. I did not smell alcohol.

11 Q. She didn't drink all that much --

12 A. Huh-uh.

13 MS. BONHAM: Objection.

14 Q. -- that you were aware of, right?

15 A. Right.

16 Q. Did she appear high to you when you picked
17 up Aniyah on May the 8th --

18 A. Yeah.

19 Q. -- from Tim's house?

20 A. Yeah.

21 Q. You thought Megan was high?

22 A. Yeah.

23 Q. How did you determine that?

24 A. Megan's face was flushed, and it was only
25 flushed when she was high. Megan was pale, so you could

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1 see the flush in her face.

2 Q. Did you see anybody else in Tim's house that
3 day?

4 A. No.

5 Q. And about what time was that, that you
6 picked Aniyah up?

7 A. I want to say 3:00. I would say 3:00 for
8 sure, because Zarihanna got off the bus at 4:30, and for
9 some reason I felt like I needed to rush back so I
10 didn't miss the bus.

11 Q. So on May 8th you picked Aniyah up from
12 Megan at about 3:00 p.m.; is that fair to say?

13 A. Yeah. I would say in between 2:00 and
14 3:30, to be safe.

15 Q. And then you went, left Tim's house and
16 drove back where? To New Philadelphia?

17 A. Yes.

18 Q. How long did it take you to get back here?
19 I'm not familiar with the area, so --

20 A. It only takes about 40 minutes, something
21 like that.

22 Q. Okay. So you got here in plenty of time to
23 go to the bus stop?

24 A. The bus stop is at my house, in my
25 driveway.

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1 Q. So how long were you home before the bus
2 came?

3 A. I don't -- it wasn't -- she came -- I'd
4 say maybe --

5 Q. Twenty minutes, half hour?

6 A. Maybe a half an hour.

7 Q. Okay. So a half hour after you got back
8 from Tim's house on May 8th the bus came?

9 MS. BONHAM: Objection.

10 Q. Would that be fair?

11 MS. BONHAM: She's given her best guess.

12 A. I guess.

13 MS. BONHAM: If you don't know, you don't
14 know.

15 Q. I'm not asking you to guess. You told me
16 about a half hour?

17 A. Well, then yeah.

18 Q. Okay. Just trying to figure something out
19 here.

20 A. Okay.

21 Q. Get things straight. And after you got home
22 and you're waiting for the bus to come, did Megan try to
23 call you at that time?

24 A. No. And to my knowledge, my phone was
25 working. It was not turned off or anything like that.

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1 I had an issue with that phone. I don't know what was
2 wrong with it, but that happened frequently, not only
3 with her, but other people had said that they called
4 certain times and the phone never rang.

5 Q. Okay. So you got home a half hour later,
6 then the bus comes and drops off --

7 A. Zarihanna.

8 Q. Tarihanna [sic]. That's Megan's niece; is
9 that who that is?

10 A. That's her.

11 MS. BONHAM: With a Z.

12 Q. Z-A-R-R-I --

13 A. Z-A-R-I-H-A-N-N-A. Zarihanna.

14 Q. And then what did you do after that?

15 A. After Zarihanna?

16 Q. Yeah. After she got off the bus.

17 A. I got the girls something to eat. I
18 actually had Aniyah in the tub, and Zarihanna come off
19 the bus, food was cooking on the stove, I got the baby
20 out of the tub. Zarihanna was happy to see her, got
21 them -- sat at the table, they ate, laughed, played, and
22 I was whooped. So I was going to call Megan, and I was
23 just so tired. I just thought, well, you know what, I
24 will pick her up tomorrow. I will get her tomorrow.

25 And then Sheri messages and says that Megan got

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1 arrested.

2 Q. Do you recall what time that was?

3 A. I don't. I just know it was in the
4 evening.

5 Q. Like 6:00, 6:30, 7:00, somewhere in there?

6 A. I'm not positive.

7 Q. And she actually -- the text message said
8 she saw --

9 A. Yeah.

10 Q. -- them get arrested?

11 A. Yeah.

12 Q. Or picked up.

13 A. Yeah, because her house is, like, right
14 beside Tim's, and the cop cars were in front of her
15 house, so she seen -- she was setting right there and
16 seen it all.

17 Q. Police say they were there at 7:00, five
18 after 7:00, so that --

19 A. Sounds --

20 Q. To your recollection, would that be about
21 the right time?

22 A. Yeah.

23 Q. And it was before that time later when you
24 checked your phone that you discovered that Megan had
25 tried to call you; is that right?

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1 A. No. I checked -- I didn't see her missed
2 calls until the next day.

3 Q. The next day. And the missed calls, were
4 they for the period of time before --

5 A. Yeah.

6 Q. -- she got picked up?

7 A. Yeah.

8 MR. LANG: I don't have any other
9 questions. Mr. Cleary might. I don't know.

10 MR. CLEARY: I have a few questions.

11 THE WITNESS: Okay.

12 MS. BONHAM: Mr. Cleary, before that can
13 we take a two-minute break?

14 MR. CLEARY: We certainly can.

15 (Off the record.)

16 MR. CLEARY: Back on the record.

17 MS. BONHAM: I'll record our agreement
18 between counsel before Mr. Cleary starts his
19 questioning. Bill and I talked about this. My
20 instruction not to answer medical questions is with
21 respect to questions outside the scope of this case and
22 the damages in this case, for instance, of physical
23 condition that preexisted this case. Bill can or Tim
24 can ask questions within the scope, medical questions
25 within the scope. It sounds like Bill doesn't have any

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1 more, but we do have an agreement that he's going to
2 submit questions to me -- records request about two
3 medical providers related to my client's counseling,
4 Barbara St. Clair and OhioGuidestone.

5 MR. LANG: Yeah. I'm going to send you
6 medical records authorizations, and then I'll send for
7 the records --

8 MS. BONHAM: And we --

9 MR. LANG: -- and supply you with copies
10 when I get them. I'll probably send a subpoena with the
11 authorization and ask them to send me the records, and
12 that usually works out well; and I'll send you copies,
13 send Mr. Cleary copies, and I don't think there would be
14 any follow-up questions of Ms. Lerrick once we receive
15 them.

16 MS. BONHAM: So I'll reserve the right to
17 object to whatever request you send, of course, but
18 we're going to handle it that way for now, and we also
19 clarified that the reference to a Dr. Camino was
20 erroneous in the record. Camille is the first name.

21 THE WITNESS: And I can't remember her
22 last name.

23 MS. BONHAM: And that's okay. Is that all
24 we had on that?

25 MR. LANG: Yeah.

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1 MS. BONHAM: Okay.

2 MR. CLEARY: Are we good?

3 MS. BONHAM: Yes.

4 CROSS EXAMINATION

5 BY MR. CLEARY:

6 Q. Okay. We have been introduced earlier.

7 A. Yes.

8 Q. Since you've had a little bit of a break, I
9 would first say to you that I have and my clients have
10 talked about this at length, and they -- each one
11 expresses their condolences and asked me to do so as well,
12 and so I would share that with you.

13 I can also tell you that I think that you have
14 answered all the questions to the best of your ability
15 so far today, but I also offer to you that if during the
16 break that we had that there's anything you would like
17 to change or modify, I would welcome you to do so now.

18 A. (Shaking head.)

19 Q. You're okay with the way things are?

20 MS. BONHAM: Objection.

21 A. Yes.

22 Q. So one of the things I'm interested in is
23 the meeting that you had where you went to pick up your
24 grandchild on the day before Megan was arrest -- really
25 put in jail, and your expression is noted in one of the

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1 police investigation files that exactly as you just said
2 it without even being asked, you said you noticed -- when
3 you got the child and Megan came out of the house, you
4 noticed that she was high; is that right?

5 A. Yeah.

6 Q. And you have explained to us that your
7 primary reason for doing that -- for making that statement
8 is because of something you, her mother, noticed that she
9 was flushed, correct?

10 A. Yeah.

11 Q. Do you think that her condition of being
12 flushed was so unusual for her that maybe I or Mr. Lang
13 would notice that if we had been standing there, that we
14 would have said, I think there's something wrong with you?

15 MS. BONHAM: Objection.

16 A. Yeah.

17 Q. It was that dominant?

18 A. Yeah.

19 Q. And is that also true because she was
20 already so frail, 100 pounds or less?

21 MS. BONHAM: Objection.

22 A. No.

23 Q. Or do I have that wrong? What?

24 A. You have that wrong.

25 Q. Okay. I thought you said that she was

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1 already down to like 100 pounds?

2 MS. BONHAM: Objection.

3 A. I didn't say any of that.

4 Q. No, somewhere else that she had lost a lot
5 of weight.

6 A. Yeah.

7 MS. BONHAM: Objection. I had not heard
8 that testimony today.

9 Q. Okay. So is that a fact --

10 MS. BONHAM: Objection.

11 Q. -- that she had lost a lot of weight and was
12 visible to you that she lost weight on that day when you
13 went to pick up the child?

14 A. No. She -- the day that I picked up the
15 child, she looked the same weight as what she weighed
16 before she went to Cambridge.

17 Q. So what --

18 A. The weight was the same.

19 Q. So what was her approximate weight, then,
20 before --

21 A. I'm not -- I don't know.

22 Q. What do you think her weight was on the day
23 that you observed her, that you picked up the child?

24 A. Guessing maybe 110, maybe 115.

25 Q. What was her height, to your recollection?

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1 A. She was, like, an inch or two taller than
2 me, so I would say five four.

3 Q. Okay. So when you spoke with her on that
4 afternoon -- just limit our conversation right now to
5 that, were there any other physical characteristics that
6 you noticed that suggested to you that she was high at
7 that time?

8 A. Other than her face being flush, I mean --
9 her eyes were glassy.

10 Q. Would you say that her conversation was
11 normal to her?

12 A. Yeah, kind of.

13 Q. Did she understand what you were speaking
14 and saying to her?

15 MS. BONHAM: Objection.

16 Q. As far as you could tell?

17 A. Yeah.

18 Q. All right. And what about her hand, arm
19 gestures? Was there anything unusual about that when you
20 were speaking?

21 A. No.

22 Q. What about her head, her gestures of her
23 face? Was there anything unusual about that?

24 A. The color, just color.

25 Q. Just the flush -- her cheeks were flush,

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1 right?

2 A. Yeah. This was flushed and --

3 Q. This meaning her cheekbones?

4 A. Yeah.

5 Q. Okay.

6 A. Her eyes were glassy.

7 Q. Okay. Any other physical characteristics of
8 her face, that is that she formed her lips in a certain
9 way or her eyes were doing something unusual? None of
10 that? Nothing else that you could see from her face, her
11 expressions --

12 MS. BONHAM: Objection.

13 Q. -- at that time?

14 A. She looked funny.

15 Q. Pardon me?

16 A. She looked funny, like --

17 Q. To you --

18 A. You know --

19 Q. To you she looked a little funny?

20 A. Yeah.

21 MS. BONHAM: Objection. Let her finish.

22 A. She looked funny.

23 Q. Can you tell me why, what funny --

24 A. Because she was using. She -- when Megan
25 was guilty of something, it showed. She never tried to

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1 hide it, you know? She was honest with you, but she
2 didn't like everybody to know her business either, so
3 unless you literally asked her, you weren't getting an
4 answer. And then, you know --

5 Q. Does that mean she was keeping it private to
6 herself?

7 MS. BONHAM: Objection.

8 A. No, no.

9 Q. What does it mean?

10 A. She would tell you, but she didn't want to
11 tell you.

12 Q. Okay. So any other physical
13 characteristics? For example, would she walk strangely?
14 Did she have an unusual gait?

15 A. She would move slower.

16 Q. What about her ability to maintain her
17 balance? Was she out of balance at all?

18 A. Sometimes, but not all the time.

19 Q. I'm talking about that afternoon when you
20 saw her.

21 A. That afternoon?

22 Q. Yes.

23 A. She come down the steps.

24 Q. How many steps?

25 A. There was about 12. His house set up on a

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1 hill.

2 Q. Handrail?

3 A. Yeah.

4 Q. Was there a handrail?

5 A. Yes, there was.

6 Q. And did she hold onto the handrail?

7 A. Yes, she did.

8 Q. But she walked down in a normal manner?

9 A. Yeah, slowly.

10 Q. Okay. She didn't require assistance?

11 A. No. If she would have required

12 assistance, I would have got it for her.

13 Q. I understand.

14 A. But no. She used the handrail. She come

15 down the steps. She kind of -- her dad was -- came down

16 to the car with me because he carried the bag. I

17 carried the baby. She come down, and Megan didn't say

18 anything, and he said let your mom take her. He didn't

19 know that she had called me and said come and get her.

20 So Megan says, she's mine. Those were her exact

21 words. She's mine, and I'm going to let her take her.

22 I'm going to give my baby a kiss, and she got in the

23 car. I had already had the baby strapped in. She got

24 in the car, and she leaned over and kissed her kid and

25 told her that she loved her; and Aniyah didn't talk at

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1 the time, just looked at her, you know, and she kissed
2 her again, and she got out of the car; and she said, I
3 love you, mom. Don't forget to come and get me. Be
4 careful. She said be careful for the drive.

5 Q. So during that entire process, Megan didn't
6 need your assistance at all?

7 A. No.

8 Q. Not to get in the car, not to do any of
9 those movements you've described?

10 A. No.

11 Q. Okay. In your earlier phone
12 conversation with her, could you tell that she was high at
13 the time of your phone conversation with her?

14 MS. BONHAM: Objection.

15 A. I can't really remember that. I mean, I
16 know --

17 Q. I don't want you to guess.

18 A. Right.

19 Q. I'm going to ask you details if, in fact,
20 that was something that you recalled.

21 A. No.

22 Q. Anything else that you can think of by
23 way of description that would have told me standing,
24 observing objectively that she was high?

25 MS. BONHAM: Objection.

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1 A. Just by looking at her.
2 Q. Just by looking at her. And that's her
3 face, and she looked a little different than usual. She
4 looked funny. That's all?

5 MS. BONHAM: Objection.

6 A. Uh-huh.

7 Q. The degree to which she could be high, could
8 that be noticed by you on different occasions? You would
9 know that she was more high or less high?

10 A. Yeah.

11 Q. So tell me what she did when she was really
12 high, that you noticed.

13 MS. BONHAM: Objection.

14 A. One time we went to the store and I had to
15 literally beg her to go with me, and then she told me
16 that she wasn't going to go in the store. She was going
17 to wait in the car. And I thought, well, I'll get her
18 to go, and once we get there I'll get her to come in.
19 Wrong. She said huh-uh. I'm not going in there. I
20 am -- no way, mom. I said, come on. I'll buy you
21 something. No. I'll set out here and listen to music.

22 Q. So she became very insistent on doing what
23 she wanted to do?

24 MS. BONHAM: Objection.

25 Q. Yes?

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1 A. I guess. I mean --

2 Q. Okay. Have you ever seen her, I'll use the
3 word drunk from alcohol?

4 A. Have I ever seen her drunk? I don't know
5 about drunk. I've seen her after she's had a few beers.

6 Q. Would her physical condition change, the way
7 she spoke or --

8 A. Huh-uh.

9 Q. -- the way she acted?

10 A. (Witness shaking head.)

11 MR. LANG: You're shaking your head.

12 A. No. I'm sorry.

13 MS. BONHAM: That's okay.

14 A. No.

15 Q. So it sounds as though she didn't drink
16 enough that she would become intoxicated --

17 MS. BONHAM: Objection.

18 Q. -- to the extent she would loose her balance
19 or slur her words, that you ever observed?

20 A. I've never observed it.

21 Q. And did you say earlier that in your meeting
22 when you went to get the child that day that you believed
23 that you didn't smell any alcohol about her?

24 A. No.

25 Q. And would you say, then, that she was not

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1 intoxicated during that occasion that you saw her and
2 spoke with her?

3 MS. BONHAM: Objection.

4 Q. Did she appear that way?

5 A. I would say that she appeared high.

6 Q. But not intoxicated from alcohol?

7 MS. BONHAM: Objection.

8 A. No.

9 Q. Not high -- not from alcohol?

10 A. Not from alcohol.

11 Q. Okay. I assume that there was the occasion
12 of the funeral later and there would possibly have been
13 some discussion of the events of that day when you went to
14 pick up the child and what Megan did that day before she
15 was arrested. Was there any such conversation or
16 information about that day from friends and other persons
17 who attended the funeral?

18 A. No.

19 Q. So no one came forward and said they knew
20 who had provided the drugs or observed what Megan had done
21 that afternoon? Was there anyone who volunteered that?

22 A. I had a lady call me that stated she
23 wasn't with Megan that day, but she was with Megan the
24 day before and that it was -- she just said some big
25 black guy with braids. That's what she said. She said

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1 she was getting high with Megan.

2 Q. He was, the big black --

3 A. No. She was.

4 Q. She was.

5 A. But she didn't come to the funeral.

6 Q. Do you recall her name?

7 A. Phyllis Barrett.

8 Q. And do you know if she was one of Megan's
9 friends or just another person present?

10 A. She wasn't a friend of Megan's, but she
11 was an acquaintance that had been to her dad's house on
12 occasions.

13 Q. Been to Tim Lerrick's?

14 A. Yes.

15 Q. Okay.

16 A. And that's all I know.

17 Q. She didn't offer any observations on the day
18 that she was arrested?

19 A. She said that she wasn't with her that
20 day. She was with her, like, the day before that.

21 Q. So the person that was arrested with Megan,
22 you never spoke with her about any details of that day?

23 A. No. For one, I personally don't like that
24 girl. Two, I don't -- I don't know. No. I mean,
25 she -- that girl's always in jail, so there's no way I

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1 could ever get to her.

2 Q. Okay.

3 A. So no.

4 Q. One of the reports references a conversation
5 with you, and it has a number of statements that was part
6 of your discussion with this officer that states that you
7 had said that Megan and the child were bouncing from meth
8 house to meth house in Coshocton around that time.

9 MS. BONHAM: Objection.

10 Q. Is that something that you recall speaking?

11 A. No, I don't. Coshocton wasn't a place she
12 would -- no. Maybe they're saying somewhere else, but I
13 don't even recall that being a conversation.

14 Q. Did you ever download or make a copy of any
15 other text messages that you had on your phone that
16 related to Megan?

17 A. No. What do you mean?

18 Q. Well, it's clear from your conversation with
19 Sheri Conner that you at least saved that part?

20 A. Yeah, the detective asked me for that.

21 Q. Oh.

22 A. I forgot for what reason. And that's -- I
23 gave that to him.

24 Q. Okay. Did you receive Megan's personal
25 phone from the county?

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1 A. Yes.

2 Q. Did you ever look at it, look at the
3 messages?

4 A. I can't get in it. It's an iPhone, and
5 she had it locked.

6 Q. In the Interrogatories you were asked about
7 where Megan would get her ordinary medical care --

8 A. Uh-huh.

9 Q. -- and I believe you said at a clinic?

10 A. Like a stat care, or she would go to the
11 ER.

12 Q. What hospital would that be?

13 A. The one here. Union. It's called
14 Cleveland Clinic Union here in Philly.

15 Q. Uh-huh. Where was Megan born?

16 A. In Zanesville, Ohio.

17 Q. At a hospital?

18 A. Uh-huh.

19 Q. What name?

20 A. Genesis Hospital.

21 Q. Was it a normal birth, as far as you recall?

22 A. Yeah.

23 Q. And she had no significant mental or
24 physical problems as a young child?

25 A. She had a physical problem as a young

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1 child. When she was five, she was in Head Start and
2 they could not get a screening on her left eye, so we
3 went to an eye doctor. The eye doctor could not get a
4 screening, so he sent me to a specialist. And then that
5 specialist couldn't. He sent me to another specialist.
6 That specialist couldn't, sent me to another one.

7 So all three of these specialists get together and
8 they say if this was my child, I would have her left
9 eye -- they called it enucleated or something like that.
10 They said that they thought that there was a malignant
11 tumor behind the left eye and I needed to get it removed
12 because it would spread to her brain and kill her.

13 So I made the decision to let them do that, and the
14 operation was supposed to be five or six hours and it
15 was, like, eight or nine; and the doctor come out and
16 said that she had a slightly detached retina with a
17 mass -- a benign mass behind the eye, so Megan had an
18 artificial eye.

19 Q. It was removed?

20 A. Yeah.

21 Q. And given an artificial at that time for
22 that reason?

23 A. Yeah.

24 Q. Okay. Did she have normal eyesight in the
25 remaining eye?

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1 A. No. She had to wear --
2 Q. Glasses?
3 A. -- bifocals by the age of five.
4 Q. Okay. Any other significant physical
5 ailments that she had as a child?
6 A. No.
7 Q. And was the birth of her child a normal
8 birth, as far as you know?
9 A. Yeah.
10 Q. Has there been any contact with the father
11 of that child that you or the family have had, to your
12 knowledge?
13 A. No.
14 Q. He seems completely disinterested?
15 A. He was completely drugged out.
16 Q. I see. Okay. Did Megan have an interest in
17 any career that she expressed?
18 A. She did.
19 Q. What was that?
20 A. Megan wanted to be a nurse.
21 Q. You said she almost had her high school
22 diploma?
23 A. Yeah.
24 Q. Was she in school? Was she enrolled at the
25 time?

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1 A. She was. She was in QDA. Quaker Digital
2 Academy. It's an online school. When I moved here,
3 Megan moved up about a year after I was here. She moved
4 in with me. She wanted a diploma. She did not want a
5 GED. So Megan asked me to take her to the high school,
6 being 19, and try to enroll her, and I did, and they
7 accepted her.

8 So she went to New Philadelphia High School for, I
9 think, one school year, and then she ended up going to
10 Quaker Digital Academy because she could still get that
11 diploma, and she realized that she was struggling more
12 with the online school than she was being in attendance,
13 because I think she had a little -- it was more self
14 discipline, you know, with the online. She had to --

15 Q. I understand.

16 A. You know what I mean?

17 Q. I do.

18 A. And so that didn't work out. She finally
19 just said I'm not going to give up. So she enrolled at
20 the Buckeye Career Center, and she said, well, mom, it
21 doesn't look like I'm going to get that diploma, but I'm
22 definitely going to get my GED. She said, I just got to
23 get four credits and get this out of the way. So she
24 enrolled at the Buckeye Career Center, and they don't --
25 schooling -- you can't just sign up and join. You have

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1 to wait. They do it like in semesters, like a fall
2 semester --

3 Q. I understand.

4 A. -- summer, spring. So she was on the list
5 for the next --

6 Q. Cycle?

7 A. Yeah. And she never made it to it.

8 Q. Okay. So while she wasn't actually enrolled
9 at the time of her death, she intended to return and
10 complete?

11 A. Yes. She was on the list to attend.

12 Q. Okay.

13 MR. CLEARY: I have nothing further today.

14 MS. BONHAM: I'll ask some follow-ups,
15 unless you want to go first, Bill.

16 MR. LANG: No.

17 MS. BONHAM: You're good?

18 MR. LANG: I'm good.

19 MS. BONHAM: I have some follow-ups.

20 DIRECT EXAMINATION

21 BY MS. BONHAM:

22 Q. The day before Megan died, we've been
23 talking about you went to Tim's to pick up Aniyah and you
24 saw Megan. That was about 2:00 or 3:00 in the afternoon,
25 right?

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1 A. Yeah. Between 2:00 and 3:30, to be safe.

2 Q. Okay. Bill asked you a little bit about
3 Megan's relationship with her family and her siblings.

4 A. Yeah.

5 Q. Can you say more about her relationship with
6 the family and any other people, grandparents, parents,
7 siblings?

8 A. I can say that Megan, again, was -- I'm
9 glad my other kids can't hear that, but she was the
10 best -- the smartest kid I had, and I still can't
11 believe that she's gone. Megan did -- she helped
12 everybody. She took care -- she helped take care of her
13 grandma. My dad had cancer. She got on me about
14 checking on him every day.

15 Megan always, for some reason, stuck to broken
16 people. She thought she could fix them and the hell
17 with her, you know? Megan -- she was a good girl.

18 There was an incident at the library in New Philly.
19 She was there one day. I don't know what she was doing
20 there, but she was there and she was -- she had her
21 purse beside her chair, and this homeless guy stole her
22 purse. Well, they have a cop or a security guy there,
23 and she's like, hey, he's got my purse, and the cop got
24 him; and he said we're going to take him downtown, and
25 she said don't do that. She said he's got enough

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1 problems. He's homeless. And so they let him go, and
2 she give him what money she had in her wallet.

3 Megan was just such a good child. She was always
4 well-mannered. I just -- I just -- I hate drugs. I
5 hate them. There's so many good people that die for no
6 reason, and it's something that we can't fix.

7 I mean -- I know I just -- her daughter cries for
8 her all the time. She doesn't really remember her, I
9 don't think. But she wants her mommy, and I told her
10 that she will see her again. I mean, that's God's
11 promise, so I believe in God, and that's all I know.

12 Megan would do anything for anybody. When she --
13 she had an apartment over here on St. Clair, and when
14 she moved in, Aniyah -- that's another thing. There
15 were people on drugs in the upstairs, and there were
16 just -- drugs were everywhere. She tried to escape them
17 and they were there.

18 But I don't know what the drug is where people act
19 weird and do all this, but a guy come out of the
20 upstairs apartment one time when I was there, and I kind
21 of couldn't believe what I was seeing. I thought, man,
22 what's going on? And Megan said, don't stare, mom.
23 Don't judge. You don't know what he's going through.
24 She said just go in there and don't pay any mind. I'm
25 like, aren't you scared? You got to live here. And she

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1 said I can't help what other people do.

2 Q. You said Aniyah misses her mom and talks
3 about her?

4 A. All the time.

5 Q. And you miss Megan and talk about her?

6 A. Yeah. I talk about her every day. People
7 think I'm crazy, but that's my way of healing, because
8 she lived -- just because she died doesn't mean that I
9 have to stop saying her name.

10 Q. Do you have other ways of remembering Megan?

11 A. Well, right now I'm just so busy with
12 these kids and work and doctors' appointments that --
13 no, I don't have much time for anything, but what I
14 would like to do is be in an overdose awareness march,
15 you know? Get something like that going. I don't know.

16 Q. You do go to counseling you testified,
17 right?

18 A. Yeah.

19 Q. Anything else like that?

20 A. No. Just counseling.

21 Q. You talked about Megan helping you in your
22 house. What kind of things did she do to help you?

23 A. Oh, gosh. I have osteoarthritis and bunch
24 of other crap going on, so Megan helped do my gardening.
25 I can't get down in the yard, and she did that for me.

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1 Megan would come -- I never had to ask her. She just
2 come and do it, you know? My dishes -- if there was
3 dishes in the sink, she would do those. She would do my
4 laundry. I mean, Megan did whatever. Now, my other
5 kids, you got to ask, and then you're lucky if they do
6 it.

7 Q. You talked about Megan helping her
8 grandparents too. What kind of things did she do for
9 them?

10 A. Well, her grandma Donna, she's 80
11 something. Megan always swept her floors. She helped
12 carry her groceries in and out of her car for her, went
13 and got her mail. Her and Megan were really, really,
14 really close. She just did a lot, a lot. She -- as a
15 matter of fact, Megan's grandma told me Saturday -- she
16 has a grandfather clock in her house, and she said that
17 that thing hasn't been cleaned since Megan cleaned it
18 last. She said Megan always cleaned the glass on her
19 hutches and her grandfather clock. She said don't tell
20 nobody that, but -- and I just laughed.

21 Q. What about Megan's other grandparents?

22 A. Megan was always helpful with my mom.
23 Megan -- my dad, she helped him, but, you know -- we
24 expected him to die before her, and then it turned
25 around to be the other way. That took a toll on my dad,

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1 you know, dealing with stage 4 colon cancer. But he
2 died six months after her. Yeah.

3 And, you know, I think that my daughter that's
4 alive uses this as a crutch for her to use -- this is
5 just terrible.

6 Q. You think Megan's death has affected your
7 other daughter?

8 A. Well, I know it has. I mean, she was in
9 prison when she died, and she didn't get, you know, to
10 spend her last years with her, and they were close, so,
11 yeah.

12 Q. And your sons?

13 A. Sure. My younger son, yeah. He won't go
14 see anybody, though. He's been -- he's backwards. But,
15 yeah, he -- it affects him. Michael, it affects him
16 too. And I think he turned it into positive because
17 there's no stopping that kid. He's doing great.

18 Q. Does Aniyah have anything to remember her
19 mom by?

20 A. Yeah. I bought her a -- I had Megan's
21 picture put on a pillow with her, and that baby sleeps
22 with that pillow every night, and then when she gets sad
23 or cries, I want -- she'll go get her pillow. I'm going
24 to get my mommy. I want my mommy here. I miss her so
25 much. Yeah.

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1 I mean, Aniyah gets upset too because she goes to
2 Head Start and she sees the other kids, their mom
3 picking them up, you know? And here's grandma picking
4 her up. She said will my mommy pick me up from school
5 when she comes back? I said, oh, Aniyah, I said grandma
6 don't have the answer to everything, but I'm sure when
7 you meet her that something like that might happen. I
8 don't know what to say.

9 Q. You testified earlier about Aniyah's
10 behavior and her health care a little bit. Does she ever
11 act out or anything like that?

12 A. No. I mean, sometimes -- she's definitely
13 ornery, but, I mean, yeah, sometimes if Aniyah's being
14 punished for something and then she's crying about it,
15 she'll say, well, I miss my mommy and I wish she was
16 here, you know? She wants -- she don't want me to
17 correct her. She wants her mom to correct her. But I'm
18 trying to show her that it's just not possible. So --

19 Q. You take care of Aniyah full-time, right?

20 A. Yeah.

21 Q. You talked about, when Mr. Cleary was asking
22 you, Megan wanted to be a nurse?

23 A. Yeah.

24 Q. Was that what she was trying to finish high
25 school to get ready for?

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1 A. Yeah. Well, she just wanted -- Megan told
2 me that she just wanted to get her diploma and then work
3 on her addiction. She told me that she knew she had a
4 warrant and that once she got that taken care of she
5 was going to tell her probation officer so she could get
6 some help. Before it was I could do this myself, mom.
7 I said, Megan, you can't. You need help. No, I'll do
8 it myself. But she finally realized that you do need
9 help, and she was supposed to tell her probation
10 officer, but she never got a chance to.

11 Q. Is that because she passed?

12 A. Yeah.

13 Q. And you said she was enrolled in this
14 Buckeye program to try and finish school. How long before
15 she passed was she enrolled in that?

16 A. I think just a couple weeks.

17 Q. You also testified that she was working.
18 Where was she working at when she was living with you?

19 A. She worked at McDonald's. No; wait. She
20 lived in her own apartment when she worked at
21 McDonald's. She worked at the Goodwill, Goodwill
22 Industries, when she was with me. And she was taking
23 classes at OhioMeansJobs opportunity center. She was
24 taking -- learning skills for different jobs, and she
25 was taking parenting classes while she was pregnant.

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1 She was trying to stay busy, stay away from the drugs.
2 Like I said, she had times where she would go, you know,
3 couple months without using. But when she used, she
4 would stay high for, you know, a little while.

5 MS. BONHAM: Thank you. I know that was
6 hard to talk about. I'm sorry. I think that's all I
7 have for now.

8 MR. LANG: I have one more question.

9 RECROSS EXAMINATION

10 BY MR. LANG:

11 Q. Why did you pick up Aniyah on May 8th?

12 A. Why didn't I?

13 Q. Why did you?

14 A. She asked me to.

15 Q. Who did?

16 A. Megan.

17 Q. She say why?

18 A. No, but I think that she knew she was
19 getting high and it was -- she just probably didn't have
20 no one to watch her, you know. She wanted her to be
21 safe. She didn't have to worry about her. I mean,
22 that's just what I'm guessing.

23 Q. So you were worried also that Megan couldn't
24 take care of her daughter --

25 MS. BONHAM: Objection.

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1 Q. -- at that time; is that right?

2 MS. BONHAM: Objection.

3 A. Yes.

4 MR. LANG: Okay. I don't have anything
5 further. You have a right to read this over. I'm sure
6 your lawyer has explained that to you.

7 MS. BONHAM: She's going to read. She's
8 not going to waive.

9 MR. LANG: I would like it typed up and
10 submitted for signature.

11 SIGNATURE NOT WAIVED

12 (Deposition concluded at 1:21 p.m.)

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REPORTER'S CERTIFICATE

I certify that this transcript, consisting of 79 pages, is a complete, true and correct transcript of the proceedings had and the testimony taken in this case as shown by my stenotype notes taken at the time said testimony was taken.

John L. Algarin
John L. Algarin

Jodie L. Algarin
Registered Professional Reporter
Certified Realtime Reporter

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1 CERTIFICATE OF NOTARY

2

3 COMPLETED BY DEPONENT:

4

5 I, SERENA LARRICK, have read the foregoing pages of my
6 testimony or have had them read to me and have noted any
7 changes in form or substance of my testimony with their
respective corrections and the reasons on the following
errata sheet(s).

8

9 SERENA LARRICK

Date

10

11

12

13 COMPLETED BY NOTARY PUBLIC

14

15 I, _____, a Notary Public in and for the
16 State of _____, hereby acknowledge that the
17 above named witness personally appeared before me, swore
to the truth of the foregoing statements and signed above
as his/her own true act and deed.

18

19 Notary

Date

20

21 Commission Expiration

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1 E R R A T A P A G E

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6

I, SERENA LARRICK, the witness herein, have
read the transcript of my testimony taken
on August 24, 2022, or have had the
transcript read to me, and the same is true
and correct, with the exception of the
following changes noted below, if any:

7

PAGE	LINE	CORRECTION, CHANGE & REASON
8	_____	_____
9	_____	_____
10	_____	_____
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SERENA LARRICK

Date



Sheri



Hey girl. Wanted to let you know
megan got arrested

What did she do

I'm actually glad



I dont know . They took her and
Jennifer. Do you have the baby



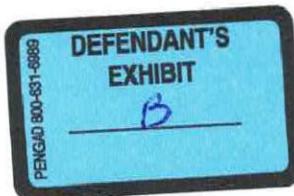
It's been crazy at Tim's

Yes , I picked her up today at
tim's



Oh okay. I thought Phyllis had her

We watched her one day. Well my
daughter Kendra did



Yes I'm so glad ↓

I'm kinda glad bc now I have
grounds to keepher





Sheri



Yes I'm so glad

I do know I'm sick of raising ,my
grown ass daughters kids !!



I bet your are. But I'm glad you
are. They need someone that is
normal

Lol ,right



If you find out anything let me
know. They found drugs on
Jennifer

Wow

Ok I will





Sheri



Hey , look on jail web site , I thought you said they found drugs on that jen , she only got assault

Andxwhy isnt megan there

Are u sure they got megan

They did. I know dont know why she didnt get charged with it. I seen them take it from her pocket

I was thinking the same thing about Megan.



I dont know where she is

This is odd



Yes it is. I never saw megan picture on the site

Me either , I called the jail





Sheri



What did they ssy

Oh well , I love having the baby here , I'm keeping her

I hope so. She needs a stable life



I dont see megan at tim's

Just that megan isnt there , I asked them if they were sure and I knew she was arrested and they got mean and said no she wasnt there

No I gotta worry about where shes at

Oh wow that's crazy I seen them hand cuff her. And put her in car



Right I can ask tim

If she was in jail I'd be ok with that ,cau ↓ know where shes at





Sheri



U can yes

Let me know



Hold on



Tim said they might be bring her to new philly



Jennifer going to carrol county is what Ray said

Tim said he wasn't home

Ok thx



If I find out anything more let you know

Ok ty





Sheri



Ok ty



11:47 AM 04/18/23



Did you find where Megan is?

11:47 AM 04/18/23



Megan.. did you find her. I'm worried.

11:47 AM 04/18/23



I'm sorry I message Micheal he told me. I'm so sorry. If I can do anything let me know. Sending prayers

11:47 AM 04/18/23



Attachment(s) have been added

